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12	META PLATFORMS, INC.	1 /	
12		Attorneys for Defendant SCIENCE FEEDBACK	
13			
14	IN THE UNITED S	TATES DISTRICT COURT	
17			
15	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
16	SAN JOSE DIVISION		
1.7	TOTAL GEOGGET	Case Number: 5:21-cv-07385-VKD	
17	JOHN STOSSEL, an individual,	Case Number: 5:21-cv-0/383-VKD	
18	Plaintiff,	SECOND LR 6-2(A) STIPULATION TO	
		EXTEND DEADLINE FOR	
19	V.	DEFENDANTS TO FILE MOTION FOR	
20	META DI ATEODMO INC D-1	ATTORNEYS' FEES AND COSTS AND	
	IMETA PLATFORMS, INC., a Delaware		
	META PLATFORMS, INC., a Delaware corporation; SCIENCE FEEDBACK, a Free	[PDOPOSED] OPDED	
21	corporation; SCIENCE FEEDBACK, a Frei non-profit organization; and CLIMATE	[PDOPOSED] OPDED	
	corporation; SCIENCE FEEDBACK, a Free	nch [PROPOSED] ORDER	
21 22	corporation; SCIENCE FEEDBACK, a Frei non-profit organization; and CLIMATE FEEDBACK, a French non-profit organizat	nch [PROPOSED] ORDER	
	corporation; SCIENCE FEEDBACK, a Frei non-profit organization; and CLIMATE	nch [PROPOSED] ORDER	
22 23	corporation; SCIENCE FEEDBACK, a Frei non-profit organization; and CLIMATE FEEDBACK, a French non-profit organizat	nch [PROPOSED] ORDER	
22	corporation; SCIENCE FEEDBACK, a Frei non-profit organization; and CLIMATE FEEDBACK, a French non-profit organizat	nch [PROPOSED] ORDER	
22 23	corporation; SCIENCE FEEDBACK, a Frei non-profit organization; and CLIMATE FEEDBACK, a French non-profit organizat	nch [PROPOSED] ORDER	
22 23 24 25	corporation; SCIENCE FEEDBACK, a Frei non-profit organization; and CLIMATE FEEDBACK, a French non-profit organizat	nch [PROPOSED] ORDER	
22 23 24	corporation; SCIENCE FEEDBACK, a Frei non-profit organization; and CLIMATE FEEDBACK, a French non-profit organizat	nch [PROPOSED] ORDER	
22 23 24 25	corporation; SCIENCE FEEDBACK, a Frei non-profit organization; and CLIMATE FEEDBACK, a French non-profit organizat	nch [PROPOSED] ORDER	
22 23 24 25 26	corporation; SCIENCE FEEDBACK, a Frei non-profit organization; and CLIMATE FEEDBACK, a French non-profit organizat	nch [PROPOSED] ORDER	

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1	Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff John Stossel, Defendant Meta			
2	Platforms, Inc. ("Meta"), and Defendant Science Feedback <sup>1</sup> (collectively, the "Parties")			
3	respectfully submit this Stipulation to extend the deadline for Defendants Meta and Science			
4	Feedback to file their respective motion for attorneys' fees and costs. This stipulated request is			
5	supported by the accompanying declaration of Thomas R. Burke.			
6	WHEREAS, Plaintiff John Stossel filed the Complaint on September 22, 2021 (Dkt. No			
7	1);			
8	WHEREAS, Meta moved to dismiss the Complaint pursuant to Federal Rule of Civi			
9	Procedure 12(b)(6) and to strike the claims asserted against Meta pursuant to California's			
10	anti-SLAPP statute on November 29, 2021 (Dkt. No. 27, "Meta's Motion");			
11	WHEREAS, Science Feedback moved to dismiss the Complaint pursuant to Federal Rule			
12	of Civil Procedure 12(b)(6) and to strike the claims asserted against Meta pursuant to California's			
13	anti-SLAPP statute on January 31, 2022 (Dkt. No. 50, "Science Feedback's Motion");			
14	WHEREAS, the Court held a hearing on both Meta's Motion and Science Feedback's			
15	Motion on April 12, 2022 (Dkt. No. 58);			
16	WHEREAS, on October 11, 2022, the Court granted both Meta's Motion and Science			
17	Feedback's Motion without leave to amend and required Meta and Science Feedback to file			
18	noticed motion for attorneys' fees and costs in compliance with Civil Local Rule 54-5 "[i]			
19	defendants seek an award of attorneys' fees and costs pursuant to the anti-SLAPP statute, Cal			
20	C.C.P. § 425.16(c)(1)" (Dkt. No. 67);			
21	WHEREAS, the Court entered judgment in favor of Meta and Science Feedback on the			
22	same day (Dkt. No. 68);			
23	WHEREAS, on October 17, the Court granted the Parties' Joint Stipulation to extend the			
24	deadline for Meta and Science Feedback's respective motions for attorneys' fees and costs from			
25	October 25, 2020 to November 22, 2022 (Dkt. No. 70);			
26				
27				
28	<sup>1</sup> Originally sued as "Science Feedback and Climate Feedback."			

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1	WHEREAS, on November 9, 2022, Plaintiff filed a notice of appeal appealing this Court's		
2	October 11, 2022 Order granting Meta's Motion and Science Feedback's Motion to the United		
3	States Court of Appeals for the Ninth Circuit;		
4	WHEREAS, the Parties believe that holding in abeyance the briefing on Meta and Science		
5	Feedback's respective motions for attorneys' fees and costs pending Plaintiff's appeal will aid in		
6	the efficient administration of justice and conserve judicial resources;		
7	WHEREAS, extending the deadline for Meta and Science Feedback to file their respective		
8	motion for attorneys' fees and costs will not affect any other date already set by Court order;		
9	IT IS HEREBY STIPULATED AND AGREED by the Parties that the deadline for		
10	Meta and Science Feedback to file their respective motion for attorneys' fees and costs shall be		
11	extended from November 22, 2022 to thirty (30) days after the United States Court of Appeals		
12	for the Ninth Circuit issues its mandate.		
13			
14		DHILLON LAW GROUP INC.	
15	Dated: November 10, 2022	By: /s/ Krista L. Baughman	
16		KRISTA L. BAUGHMAN	
17		Attorneys for Plaintiff John Stossel	
18	Dated: November 10, 2022	WILMER CUTLER PICKERING HALE AND DORR LLP	
19			
20		By: /s/ Molly M. Jennings MOLLY M. JENNINGS	
21		Attorneys for Defendant Meta Platforms, Inc.	
22	Dated: November 10, 2022	DAVIS WRIGHT TREMAINE LLP	
23	Buted: November 10, 2022		
24		By: <u>/s/ Thomas R. Burke</u> THOMAS R. BURKE	
25		Attorneys for Defendants Science Feedback	
26		and Climate Feedback	
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	S	SECOND STIP TO EXTEND DEADLINE FOR DEFS' FEES MOT.	

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1	[PROPOSED] ORDER	
2	PURSUANT TO STIPULATION, IT IS SO ORDERED that:	
3	The deadline for Meta and Science Feedback to file their respective motion for attorneys'	
4	fees and costs shall be extended from November 22, 2022 to thirty (30) days after the United	
5	States Court of Appeals for the Ninth Circuit issues its mandate.	
6		
7	Dated:	
8	By: Hon. Virginia K. DeMarchi	
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SECOND STIP TO EXTEND DEADLINE FOR DEFS' FEES MOT. CASE NO. 5:21-CV-07385-VKD

**ATTORNEY ATTESTATION** I, Thomas R. Burke, am the ECF User whose ID and password are being used to file this Stipulation and accompanying proposed order. In compliance with Civil Local Rule 5-l(h)(3), I hereby attest that concurrence in the filing of this document and all attachments has been obtained from each signatory. Dated: November 10, 2022 /s/ Thomas R. Burke By: Thomas R. Burke